UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 22, 2016

Colonel Jon J. Chytka
Commander, U.S. Army Corps of Engineers
Mobile District
109 St. Joseph Street
Mobile, Alabama 36602

Attention: Dr. Susan I. Rees (CESAM-PD)

Subject: EPA Comments on the Final Supplemental Environmental Impact Statement (FSEIS) for the Mississippi Coastal Improvements Program (MsCIP) Comprehensive Barrier Island Restoration; Hancock, Harrison, and Jackson Counties, Mississippi
ERP#: COE-E39075-MS and CEQ #: 20160013

Dear Colonel Chytka:

Pursuant to Section 309 of the Clean Air Act, and Section 102(2)(c) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the subject document. As a cooperating agency on the project, the EPA participated in interagency meetings and interim document reviews. The purpose of this letter is to provide you with the EPA's Final Supplemental Environmental Impact Statement (FSEIS) comments on the proposed project.

The subject document is a supplement to the Mississippi Coastal Improvements Program (MsCIP) Comprehensive Plan and Integrated Programmatic Environmental Impact Statement (PEIS) (USACE, 2009a). The MsCIP PEIS evaluated measures to promote the recovery of coastal Mississippi from the hurricanes of 2005 and to increase the resilience of the coast against damage from future storms. The PEIS recommended a number of important elements for phased implementation over a 30–40 year period including the comprehensive restoration of the Mississippi barrier islands.

The EPA supports the need to protect and maintain the estuarine ecosystem of Mississippi Sound, reduce the amount of storm damage incurred along the mainland coast of Mississippi, and preserve and protect the Mississippi barrier islands and their natural and cultural resources. In our previous comment letter dated April 21, 2014, the EPA recognized that sea level rise was the primary driver of coastal land loss and that storms were the means of sediment redistribution and land loss along the Mississippi Gulf Coast. We also noted that the SEIS identifies a longer-term solution for island restoration by adding large volumes of beach quality sand back into the littoral sediment transport system to nourish adjacent barrier islands and to mitigate for land losses.

The FSEIS evaluates a No-Action alternative and a Tentatively Selected Plan (TSP) Alternative for restoring the Mississippi barrier island system. The TSP Alternative includes the restoration of Ship Island, the placement of beach-front and dune sand along Cat Island and the management of maintenance dredged materials from the Pascagoula Ship Channel. Within the TSP alternative, the FSEIS also evaluates alternative sand borrow areas including the preferred Borrow Site Option (BS Option 4), site-specific options for restoration at the sand placement locations authorized for construction, and specification of sand quantity for the Cat Island restoration, engineering and design alternatives, and proposed construction methods.

Approximately 22 million cubic yards (mcy) of sand will be placed on the barrier island or within the littoral transport system. Specifically, the Ship Island restoration involves directly placing about 13.5 mcy of sand between East Ship Island and West Ship Island to fill a 3.5-mile breech in Camille Cut and placing 5.5 mcy of sand along the southern shoreline of East Ship Island to replenish sand and build up the island. The total fill encompasses 1,500 acres with 800 acres above the Mean High Water Level (MHWL). The sand used in these areas would be dredged from five main borrow areas offshore from Ship Island, Petit Bois Pass (AL, MS, Outer Continental Shelf) and Horn Island Pass. The Cat Island dune and beach restoration plan involves placing natural dune vegetation and 2 mcy of sand found off of the eastern shoreline of Cat Island directly on the eastern shore face of Cat Island. The total fill area encompasses 305 acres which would restore the island to 1998 conditions.

The EPA's Draft SEIS comments described the impacts, benefits and some of the uncertainties associated with the TSP. The TSP will result in new habitat on Ship and Cat Island, additional foraging habitat for wintering birds, new intertidal wetlands, and a reduction in wave height on the mainland as well as the loss of critical habitat for the Gulf sturgeon, impacts to nesting turtles, disruptions to resident birds and breeding migrants, submersion of 'infaunal' species and displacement of 'epifaunal' invertebrates. Uncertainty also remains regarding the impact of prolonged and uninterrupted construction activities on Ship Island over a minimum period of 2.5 years. Approximately 1,500 acres of habitat will not be useable during this period. EPA noted from our review that it was unclear what the potential impacts to nesting, spawning, and benthic communities will have on populations, or reduced dissolved oxygen and increased turbidity may mean for fishing in the area during this period. It was also unclear in some cases what the extent of the turbidity plumes might be.

To help ensure that restoration goals are met and that natural resource concerns such as water quality and impacts to fish and wildlife species are fully addressed in the face of some remaining uncertainty, a monitoring and adaptive management plan (MAM) is included in the FSEIS. The EPA appreciates the inclusion of a MAM plan because it helps to alleviate the remaining resource concerns that the EPA expressed in its review of the DSEIS. The MAM plan which will be overseen by a MAM Oversight Committee will include routine monitoring and adaptive strategies that will help inform this and future restoration projects within the project area. The EPA continues to support efforts to protect the Mississippi Gulf Coast from future storm damage by restoring the Mississippi Barrier Islands.

Thank you for the opportunity to comment on this project. The EPA requests a copy of the Record of Decision for this project when it becomes available. If you have any questions or require technical assistance, please contact Ntale Kajumba of my staff at (404) 562-9620.

Sincerely,

Christopher Militscher, Chief
NEPA Program Office
Resource Conservation and Restoration Division